

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

MDL No. 2804

Case No. 17-md-2804

This document relates to:

Judge Dan Aaron Polster

Case No. 1:18-op-46327-DAP

MICHELLE FROST, LEGAL GUARDIAN OF
CHILD D.F., and STEPHANIE HOWELL,
LEGAL GUARDIAN OF CHILD C.L.,
on Behalf of Themselves and All Other
Similarly Situated Legal Guardians,

Plaintiffs,

v.

ENDO HEALTH SOLUTIONS INC.; ENDO
PHARMACEUTICALS, INC.; PAR
PHARMACEUTICAL, INC.; PAR
PHARMACEUTICAL COMPANIES, INC. f/k/a
PAR PHARMACEUTICAL HOLDINGS, INC.;
JANSSEN PHARMACEUTICALS, INC.;
JANSSEN PHARMACEUTICA, INC. n/k/a
JANSSEN PHARMACEUTICALS, INC.;
NORAMCO, INC.; ORTHO-MCNEIL-JANSSEN
PHARMACEUTICALS, INC. n/k/a JANSSEN
PHARMACEUTICALS, INC.; JOHNSON &
JOHNSON; TEVA PHARMACEUTICAL
INDUSTRIES LTD.; TEVA
PHARMACEUTICALS USA, INC.;
CEPHALON, INC.; ALLERGAN PLC f/k/a
ACTAVIS PLC f/k/a ALLERGAN, INC.;
ALLERGAN FINANCE, LLC f/k/a ACTAVIS, INC.
f/k/a WATSON PHARMACEUTICALS, INC.;
ALLERGAN SALES, LLC; ALLERGAN
USA, INC.; WATSON LABORATORIES, INC.;
WARNER CHILCOTT COMPANY, LLC;
ACTAVIS PHARMA, INC. f/k/a WATSON
PHARMA INC.; ACTAVIS SOUTH ATLANTIC
LLC; ACTAVIS ELIZABETH LLC; ACTAVIS

MID ATLANTIC LLC; ACTAVIS TOTOWA LLC;;
 ACTAVIS LLC; ACTAVIS KADIAN LLC; :
 ACTAVIS LABORATORIES UT, INC. f/k/a :
 WATSON LABORATORIES, INC.-SALT LAKE :
 CITY; ACTAVIS LABORATORIES FL, INC. :f/k/a
 WATSON LABORATORIES, INC. – :
 FLORIDA; :
 MALLINCKRODT PLC; MALLINCKRODT LLC;;
 SPECGX LLC; DEPOMED, INC.; INDIVIOR, ;
 INC.; RICHARD S. SACKLER; JONATHAN D. :
 SACKLER; MORTIMER D.A. SACKLER; :
 KATHE A. SACKLER; ILENE SACKLER :
 LEFCOURT; BEVERLY SACKLER; THERESA :
 SACKLER; DAVID A. SACKLER; RHODES :
 TECHNOLOGIES; RHODES TECHNOLOGIES :
 INC.; RHODES PHARMACEUTICALS L.P.; :
 RHODES PHARMACEUTICALS INC.; TRUST :
 FOR THE BENEFIT OF MEMBERS OF THE :
 RAYMOND SACKLER FAMILY; THE P.F. :
 LABORATORIES, INC.; CARDINAL HEALTH, :
 INC.; MCKESSON CORPORATION; :
 AMERISOURCEBERGEN DRUG CORP.; :
 HEALTH MART SYSTEMS, INC.; H. D. SMITH, :
 LLC d/b/a HD SMITH f/k/a H. D. SMITH :
 WHOLESALE DRUG CO.; H. D. SMITH :
 HOLDINGS, LLC; H. D. SMITH HOLDING :
 COMPANY; CVS INDIANA, LLC; CVS HEALTH :
 CORPORATION; CVS RX SERVICES, INC.; :
 DISCOUNT DRUG MART, INC.; HBC SERVICE :
 COMPANY; PRESCRIPTION SUPPLY, INC.; :
 RITE AID CORPORATION; RITE AID OF :
 MARYLAND, INC.; RITE AID OF MARYLAND, :
 INC. d/b/a RITE-AID MID-ATLANTIC :
 CUSTOMER SUPPORT CENTER, INC.; :
 WALGREEN CO.; WALGREENS BOOTS :
 ALLIANCE, INC.; WALGREEN EASTERN :
 CO.; WAL-MART INC. f/k/a WAL-MART :
 STORES, INC.; MIAMI-LUKEN, INC.; and :
 COSTCO WHOLESALE CORPORATION; :

Defendants.

INTERROGATORIES
and
REQEUST FOR PRODUCTION OF DOCUMENTS

Plaintiffs, Michelle Frost, Legal Guardian of Child Dustin Frost and Stephanie Howell, Legal Guardian of Child Christopher Lewis, on Behalf of Themselves and All Other Similarly Situated Legal Guardians, by and through undersigned counsel, pursuant to Rule 34 of the Federal rules of Civil Procedure, hereby propounded the following Interrogatories and Request for Production of Documents to Defendants, Endo Health Solutions, Inc.; Eno Pharmaceuticals, Inc.; Par Pharmaceutical, Inc.; Par Pharmaceutical Companies, Inc., f/k/a Phar Pharmaceutical Holdings, Inc.; Janssen Pharmaceuticals, Inc.; Janssen Pharmaceutical, Inc. n/k/a Janssen Pharmaceuticals, Inc.; Noramco, Inc.; Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc.; Johnson & Johnson; Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Cephalon, Inc.; Allergan PLC f/k/a Actavis PLC f/k/a Allergan, Inc.; Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.; Allergan Sales, LLC; Allergan USA Inc.; Watson Laboratories, Inc.; Warner Chilcott Company, LLC; Actavis Pharma, Inc. f/k/a Watson Pharma Inc.; Actavis South Atlantic, LLC; Actavis Elizabeth, LLC; Actavis Mid Atlantic, LLC; Actavis Totowa, LLC; Actavis, LLC; Actavis Kadian, LLC; Actavis Laboratories UT, Incl f/k/a Watson Laboratories, Inc.-Salt Lake City; Actavis Laboratories FL, Inc. f/k/a Watson Laboratories, Inc.-Florida; Mallinckrodt PLC; Mallinckrodt, LLC; SpecGx LLC; Depomed, Inc.; Indivior, Inc.; Cardinal Health, Inc.; McKesson Corporation; AmerisourceBergen Drugs Corp.; Health Mart Systems, Inc.; H.D. Smith, LLC d/b/a HD Smith f/k/a H.D. Smith Wholesale Drug Co.; H.D. Smith Holdings, LLC; H.D. Smith Holdings Company; CVS Indiana, LLC; CVS Health Corporation; CVS RX Services, Inc.; Discount Drug Mart, Inc.; HBC Service Company; Prescription Supply, Inc.; Rite Aid Corporation; Rite Aid of Maryland, Inc.; Rite Aid of Maryland, d/b/a Rite-Aid Mid-Atlantic Customer Support Center, Inc.; Walgreen Co.; Walgreens Boots Alliance, Inc.; Walgreen Eastern Co.; Wal-Mart, Inc. f/k/a Wal-Mart Stores, Inc.; Miami-Luken, Inc. and Costco Wholesale Corporation. Your responses

to these interrogatories or requests for production are due within thirty (30) days from the date of service.

DEFINITIONS:

As used in these Interrogatories and Requests:

1. "Child/Baby" means or refers to Dustin D. Frost and/or Christopher Lewis.
2. "Legal Guardian" means or refers to Michelle Frost and/or Stephanie Howell.
3. "Birth Mother" means or refers to Erin Doyle and/or Stephanie Howell.

INTERROGATORIES

1. Please describe any and all toxicological, pharmacological, pharmo-kinetic, longitudinal or other scientific study of opioids conducted on animals in your possession including in the description the title of such studies, date of issuance, who led the study, whether the study was provided to the FDA, and the cost of the study.
2. Please describe any and all toxicological, pharmacological, pharmo-kinetic, longitudinal, clinical trial or other scientific study of opioids conducted on humans in your possession including in the description the title of such studies, date of issuance, who led the study, who funded the study and the cost of the study.
3. Please describe all scientific studies of any sort in your possession, not listed above, that address genotoxicity, teratogenic, mutagenic or development impacts of in utero exposure to opioids.
4. Identify all witnesses you will or may call at the Class Certification Hearing. Provide their full name, address and state the facts you intend to prove and/or disapprove with each witness. State if they are a lay or expert witness; if expert, state their opinions and the basis thereof.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All studies described in your response to Interrogatory Nos. 1, 2 and 3 above.
2. All emails, memos, presentations, white papers or other documents related to your response to Interrogatories Nos. 1, 2 and 3 above.
3. Please provide any and all documents in your possession that contain the words “Neonatal Abstinence Syndrome”, “NAS”, “infant”, “baby(ies)”, “spina bifida” “club foot” or “in utero”.
4. Please provide any and all documents related to studies of rats or rabbits exposed to opioids.
5. All non-privileged documents in your possession relating to:

- Baby: Dustin Doyle Frost
- Guardian: Michelle Frost
- Birth Mother: Erin Doyle
- Birth City: Circleville, OH

and

- Baby: Christopher Lewis
- Guardian: Stephanie Howell
- Birth Mother: Stephanie Howell
- Birth City: Washington Township, OH

and

- Expert: Harvey Rosen
- Expert: Charles Vyvyan Howard
- Expert: Charles Livingston Werntz, III

6. All documents, things, charts or demonstrative evidence you will or may use at the Class Certification Hearing.
7. Produce all prescription records for Dustin D. Frost and Christopher Lewis within one hundred fifty (150) miles of Circleville, OH and Ryan Ramirez within one hundred fifty (150) miles of Washington Township, OH. See attached HIPAA forms.

DATED: October 15, 2019.

Respectfully submitted,

/s/ Marc E. Dann

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed via the Court's electronic filing system on October 15, 2019. Notice of this filing will be sent by e-mail through the Court's electronic case-filing system to all counsel of record.

/s/Celeste Brustowicz
Celeste Brustowicz